

NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP
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July 2, 2020

By Electronic Mail and First Class Mail

Ms. Sheri L. Bianchin
 Remedial Project Manager
 Institutional Controls Coordinator
 U.S. Environmental Protection Agency Region 5
 77 West Jackson Boulevard (SR-6J)
 Chicago, IL 60604

Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree – Quarterly Progress Report 58 (April-June 2020)

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from April-June 2020.

1. Actions Taken During Previous Quarter to Comply with the Consent Decree:

- **Institutional Controls:** During the April-June 2020 period, the Group’s representatives participated in a conference call with EPA and discussed the status of institutional controls activities, including unresolved issues related to several remote fill properties.
- **Operation and Maintenance:** During the April-June 2020 period, the following operation and maintenance activities were performed at the site:

May 29	The Group’s project coordinator sent an email to the Group’s contractor, Munie Greencare Professionals (“Munie”), to confirm Munie’s plans for the initial 2020 mowing and vegetation control activities on the 1555 State Street and Taracorp pile properties in Granite City.
June 8	The Group’s project coordinator spoke to the Granite City Sanitation Department’s representative in regard to the Group’s 2020 plans for cutting vegetation on the 1555 State Street and Taracorp pile properties in Granite City.
June 9	Munie cut the vegetation on the flat portions of the 1555 State Street property and applied herbicide along the fenceline to control the growth of vegetation on and near the fence.

June 25	The Group's project coordinator performed a semi-annual operation and maintenance inspection at the site.
June 29	Based on the results of the operation and maintenance inspection, the Group's project coordinator sent an email to the owner/operator of All Pallet Services regarding the need for fence repairs along the southwestern side of the Taracorp pile property.
June 29	Based on the results of the operation and maintenance inspection, the Group's project coordinator sent an email to Munie's project coordinator regarding the need for mowing the 1555 State Street property and cutting shrubs along the fence.
June 30	The Group's project coordinator sent a letter to EPA to document the results of the semi-annual operation and maintenance inspection performed at the site on June 25, 2020.

- **Project Coordination:** During the April-June 2020 period and in addition to items previously noted, the Group's project coordinator performed the following work related to the site:

April 1	Submitted Quarterly Progress Report 57 to EPA.
April 7	Communicated with EPA's project manager in regard to potential dates for a conference call with EPA and Illinois EPA.
April 21	Communicated with EPA, in response to an email from EPA's project manager, regarding the Group's availability for the conference call with EPA and Illinois EPA.
April 22	Sent an email to EPA's project manager to provide a document, summarizing the status of institutional controls at the site, for potential discussion during the Group conference call with EPA and Illinois EPA.
April 27	Spoke to EPA's project manager in regard to the agenda for the May 7, 2020 conference call.
April 27	Sent an email to EPA, Illinois EPA, and the Group in regard to the May 7, 2020 conference call.
May 4	Sent an email to EPA and Illinois EPA to provide an expanded version of the document for discussion during the May 7, 2020 conference call.
May 6	Spoke to EPA's project manager and subsequently sent a revised document to EPA, Illinois EPA, and the Group summarizing the status of institutional controls for discussion during the May 7, 2020 conference call.
May 7	Participated in the Group's conference call with EPA and Illinois EPA and discussed the status of the institutional controls program and unresolved issues.

May 7	Sent a revised version of the May 7, 2020 presentation regarding institutional controls to EPA and Illinois EPA to address an editorial comment provided by Illinois EPA.
May 7	Sent an email to EPA's project manager to provide draft environmental covenants for the Slough Road (Brenda Ervin, Transload Realty, and US Carriers) properties.
May 7	Sent an email to EPA's project manager to provide draft environmental covenants for the Mayco Industries properties at the main industrial site.
June 8	In response to a request from EPA's project manager, sent four emails to EPA to provide the draft environmental covenants for the Slough Road properties (properties owned by Brenda Ervin, Transload Realty, and US Carriers, Inc.); for the 1555 State Street property, the Taracorp pile property, the Taracorp Unknown Road property, and the Terminal Railroad Association property at the main industrial facility; the Scott Oney properties and the Oney-Shrum property at the main industrial facility; and the Mayco Illinois LLC properties at the main industrial facility.

2. Summary of Data and/or Results of Sampling and Tests Received:

- Not applicable for this reporting period.

3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:

- Not applicable during this reporting period.

4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:

- The Group's representatives will continue to perform operation and maintenance activities at the site, as required. As part of the Group's operation and maintenance activities, the Group anticipates that additional discussions will occur with EPA related to operation and maintenance activities for several remote fill properties.
- The Group will address EPA's comments, if any are received, on the revised draft environmental covenants most recently submitted to EPA and Illinois EPA in May 2020 and June 2020.
- The Group will address comments, if any are received, on the draft administrative records, draft notices of soil contamination, and draft notices of potential soil contamination for 15 denied access residential properties that were submitted to EPA and Illinois EPA in September 2019.

- The Group anticipates that additional discussions will occur with the Venice attorney in regard to the Venice roadways ordinance.
- The Group will continue to monitor All Pallet Services' efforts to repair the fence along the south side of the Taracorp pile.
- The Group will continue to address EPA's comments, update the Institutional Controls Work Plan, and implement institutional controls as the scope of institutional controls activities are finalized.
- The Group's project coordinator will continue to update the Operation and Maintenance Plan as institutional controls activities are finalized.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA in February 2019 to document the results of the November 2018 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April-May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties (Non-Responsive, Non-Responsive, and Non-Responsive) in June 2015 and one residential property (Non-Responsive) in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties (Non-Responsive) in August 2016.

5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:

- During the May 2019 operation and maintenance inspection, the Group's project coordinator observed scattered hard rubber battery case chips in the surface soil in several areas on a vacant lot on Harrison Street in Eagle Park Acres where vegetation appeared to have been recently cleared. The Group's project coordinator notified EPA about this matter on May 24, 2019 and examined the property with EPA and Illinois EPA during the November 2019 site visit. The Group anticipates that additional discussions will occur with EPA about this matter.

6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:

- Not applicable for this reporting period.

7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:

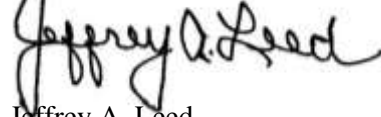
- Not applicable for this reporting period.

Ms. Sheri Bianchin
July 2, 2020
Page 5

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.

A handwritten signature in black ink, appearing to read "Jeffrey A. Leed". The signature is fluid and cursive, with the first name "Jeffrey" being more prominent.

Jeffrey A. Leed
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Mr. Brian Conrath - Illinois EPA (by electronic mail and first class mail)
Mr. Tom Miller – Illinois EPA (by electronic mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)